

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CAITLIN O’CONNOR,)	
)	
Plaintiff,)	No. 3:20-cv-00628
)	
v.)	Judge Eli J. Richardson
)	
)	
THE LAMPO GROUP, LLC a/k/a)	Magistrate Judge Frensley
RAMSEY SOLUTIONS,)	Jury Demand
)	
Defendant.)	

MOTION TO SEAL

Plaintiff moves to seal her opposition to Defendant’s publicly filed motion for summary judgment (ECF 67) because it references numerous depositions and documents demonstrating factual disputes, but which were omitted from Defendant’s motion. Due to Defendant’s expansive view of what should be kept out of the public record, it designated all or part of deposition transcripts and exhibits as “confidential” or “attorney’s eyes only;” as such, Plaintiff is filing the documents under seal as required by the Local Rules. Plaintiff has redacted names and identifying information of comparators in the deposition transcripts and exhibits as much as possible and done the same in her opposition. Nonetheless, Defendant refused to concede these measures addressed their concerns. Plaintiff disputes the designations made by Defendant. At this stage, it is Defendant’s burden to demonstrate compelling reasons why these documents must be kept under seal in whole or in part, or if so, which part of the documents.

Plaintiff is attaching the following, which Defendant designated in whole or in part:

1. 6/22/21 Dep. Caitlin O’Connor (“O’Connor Dep.”)
2. 6/29/21 Dep. Armando Lopez (“Lopez Dep.”)

3. 6/30/21 Dep. Mark Floyd (“Floyd Dep.”)
4. 7/20/21 Dep. Jennifer Sievertsen (“Sievertsen Dep.”)
5. 8/6/21 Dep. Jack Galloway (“Galloway Dep.”)
6. 9/10/21 Dep. Suzanne Simms (“Simms Dep.”)
7. 9/21/21 Dep. Andrew Walker, Ph.D. (“Walker Dep.”)
8. 9/28/21 Dep. Mike Finney (“Finney Dep.”)
9. 9/30/21 Dep. Rule 30(b)(6) Deposition (Lopez, Galloway, Simms (“30(b)(6) Dep.”))
10. 11/12/21 Dep. Dave Ramsey (“Ramsey Dep.”)

Deposition Exhibits: ¹

1. Plaintiff’s Exhibits: 1-3, 5-9, 11, 12, 14, 17, 18, 21-25, 27, 30, 31, 34-43
2. Defendant’s Exhibits: 9

Summary Judgment Exhibits

1. Plaintiff’s Designated Expert Report: Ellen T. Armour, Ph.D.²
2. Plaintiff’s Designated Expert Report: Julie Ingersoll, Ph.D.³
3. MSJ Ex. 3 p. 2636 05/18/19 Email Thread Simms to Members of Operating Board (“MSJ Opp. Ex. 3”)
4. MSJ Ex. 4 p. 2661-63 12/21/2018 Email Thread Sievertsen to Operating Board (“MSJ Opp. Ex. 4”)

Respectfully submitted,

¹ Plaintiff maintained a consecutive set of deposition exhibits. Defendant used repetitive numbering.

² Dr. Armour is the E. Rhodes and Leona B. Carpenter Chair in Religion, Gender, and Sexuality, Vanderbilt University Divinity School.

³ Dr. Ingersoll is Professor of Religious Studies, Religious Program Director, Department of Philosophy and Religious Studies, University of North Florida.

s/ Heather Moore Collins
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been e-mailed on December 17, 2021 to counsel of record through the court's CM/ECF system:

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/s/ Heather Moore Collins
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